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6 *Attorneys for Defendants*
7 *Desert Ready Mix, LLC and Jim Chico*

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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 FERNANDO MADERA,
13 Plaintiff,
14 vs.
15 DESERT READY MIX, LLC., a Nevada limited
liability corporation; JIM CHICO,
16 Defendants.

Case No.: 3:22-cv-00255-RCJ-CLB

**STIPULATION AND ORDER TO EXTEND
DEFENDANT'S DEADLINE TO
FILE RESPONSIVE PLEADING
(Second Request)**

18 Defendant Desert Ready Mix, LLC and Jim Chico (collectively referred to as
19 "Defendants"), by and through their counsel of record, ANTHONY HALL and JONATHAN
20 MCGUIRE of SIMONS HALL JOHNSTON, and Plaintiff FERNANDO MADERA, ("Plaintiff")
21 by and through his counsel of record, ALEXANDER CHERUP and DAVID OLSHAN of
22 NEVADA LEGAL SERVICES, INC. hereby stipulate and agree to extend the deadline for
23 Defendants to file their responsive pleading. The response, currently due on July 21, 2022, will be
24 extended by one (1) week to and including **July 28, 2022**.

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This is the parties second request for an extension for Defendants to respond to Plaintiff's Complaint and is made in good faith and not for the purpose of delay. Counsel for Defendants has unexpectedly been required to oppose a petition for injunctive relief brought pursuant to 29 U.S.C. §160(j) on a motion to expedite, which has prevented counsel for Defendants from dedicating the time required to a responsive pleading in this case.

DATED: July 19th, 2022

DATED: July 19th, 2022

NEVADA LEGAL SERVICES, INC.

SIMONS HALL JOHNSTON PC

/s/ David Olshan

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ORDER

IT IS SO ORDERED.

Dated: July 20, 2022


UNITED STATES MAGISTRATE JUDGE

SIMONS HALL JOHNSTON PC
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